

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Ayaham Hoshan	:	Chapter 13
	:	
Debtor	:	Case No.: 19-14742AMC

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**AMENDED MOTION TO APPROVE PERSONAL INJURY SETTLEMENT**

The Debtor, by and through his undersigned counsel, hereby moves to appoint his personal injury attorney and obtain approval to settle her personal injury case and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about July 30<sup>th</sup>, 2019.
2. Debtor suffered personal injury, when he was in a car accident that occurred on May 23<sup>rd</sup>, 2018.
4. The Debtor approached Murray Greenfield, Esq. to represent him in a personal injury action against Defendant Michael Distefano.
5. Debtor suffered physical injuries, which he has treated for since the accident took place.
6. Mr. Greenfield is an experienced and duly licensed personal injury Attorney in the Commonwealth of Pennsylvania.
7. Recently, and after the filing of Debtor's Bankruptcy filing, Mr. Greenfield was able to obtain a settlement offer of the Debtor's personal injury case. Please see Settlement Distribution Sheet attached and marked as "**Exhibit A.**"
8. Said Distribution Sheet reflects the medical care the Debtor required while treating for his injury. **See Id.**

9. After all costs and reasonable attorney fees are accounted for, Debtor is entitled to receive \$17,334.95. **See Id.**

10. Debtor has listed the personal injury suit on Schedules A/B & C, and fully exempt this \$17,334.95 award under 11 U.S.C. § 522(d)(11)(D), as this award is to compensate him for damages traceable to actual physical injury he sustained from the accident.

WHEREFORE, the Debtor humbly requests that this Honorable Court allow the settlement of the personal injury case per the Distribution Sheet, and allow the Debtor to receive his Exempted damages award.

Dated: October 1, 2019

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
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